

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH CAROLINA
CASE NO. 5:20-CV -230**

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CAMERON CAIN BAARBE, *et al.*,

Plaintiffs,

-against-

THE SYRIAN ARAB REPUBLIC,

Defendant.

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DECLARATION OF LIRON GREENFIELD

LIRON GREENFIELD, pursuant to 28 U.S.C. § 1746, declares and states as follows subject to the penalties for perjury of the United States of America:

1. I am a United States citizen domiciled in Israel.
2. I am the son of Ron and Pnina Greenfield.
3. In March, 2016 my parents and aunt decided to go on a food tour of Istanbul. I was a little apprehensive about the trip but I reasoned everything would be alright. On the third day of their trip, March 19, 2016, my father sent a message on the family's WhatsApp group saying they had experienced an explosion. Initially, I thought my father was making a joke—that they had exploded from eating so much on their food tour. However, my aunt called shortly after the WhatsApp message and was shouting my father's name and crying. The phone call was then disconnected. I understood there had been some sort of terrorist or criminal bombing in Turkey. I grew increasingly anxious, but I was still unsure what exactly had happened. The waiting was extremely stressful as I knew something horrible had occurred. A few minutes later various news

outlets reported that a terror attack had occurred in Istanbul. I now understood my parents and aunt were on site in the attack I was seeing in the news, I was shocked and began to panic. I felt very helpless being such a distance away.

4. I frantically tried calling my parents and after a few attempts got through to my father and mother. I was incredibly grateful they were alive but was still terrified, as the calls confirmed they were injured. Both of my parents had injuries in their feet and they were in intense pain. My uncle and I then took the first flight to Turkey that we could find in order to be with my parents and aunt.

5. The airplane ride was challenging, I was anxious to be with my parents but knew it would be difficult to see them in an injured state. After arriving in Turkey, I quickly took a taxi to the hospital. It was emotional for me to see my parents and aunt lying in hospital beds. Only a few days before they had been traveling around Turkey happily vacationing and enjoying the culture and cuisine. I did not have any real time to process the trauma of these events at the time, as my parents needed me. I had to stay strong and project an image of stability. Actually, I was very ripped apart. The entire experience and everything that was happening was so shocking, like out of a nightmare. I was involved in their recovery in Turkey and had to arrange a special flight back to Israel for my parents through their insurance.

6. The months that followed were very stressful and left me with little time to process the attack. My parents required multiple surgeries and were in wheelchairs, so I had to leave work for six months to care for them. I had to help my parents with showers, going to the toilet, dressing, and taking them to medical appointments. Seeing my parents in such vulnerable positions was very distressing for me. While I was incredibly grateful that my parents had survived the terror attack, I still experienced a lot of depression and grief surrounding the repercussions the attack had on my

life. Emotionally and physically my parents were not the same people they had been before, and I had to assume the role of a caregiver. It placed a very heavy burden on my shoulders and I was not sure I was up to this task.

7. I have always been close with my parents, especially my mother whom I consider my best friend, so to see my parents disabled for months after the attack was extremely traumatic. My life was consumed by the aftermath of the attack. Leaving work to take care for them created a stressful financial burden, as I had no income and extra expenses associated with their care, including travel, rent, and parking fees. Additionally, I had no time for my friends and my girlfriend because my parents needed me, which meant that I had a limited support network during this incredibly distressing time. I was really isolated and alone.

8. Since the attack I have become a much more anxious person. In the years since, I have experienced many symptoms of post-traumatic stress disorder; I have nightmares about explosions, flashbacks to the phone calls where my parents told me about the attack, and extreme guilt that I did not discourage my parents forcefully enough not to go on the trip despite the travel alert that was present prior to them leaving on the tour. When I speak about the terror attack, I tense up and shiver. I used to be a calm person but now I am much more suspicious of my surroundings and frequently feel anxious that something might happen. Though meeting with a psychologist was recommended to me, I declined it because it was too hard for me to talk about the trauma. As my way of processing the event, I got a tattoo on my forearm with a replica of the passport stamp I received when I entered Turkey to be with my parents after the attack. I am reminded of the attack each time I look at the tattoo.

9. Today, my parents still struggle with their physical and emotional wounds from the terrorist bombing. Though my mother has for the most part recovered physically, my father was

more seriously injured and will never be able to get back to his previously healthy and active lifestyle. This has left my father frustrated and dejected. Seeing my parents struggle physically and mentally since the attack has added on to my own trauma. It is shocking how one despicable act has shaken and changed the lives of every member of my family so deeply. My only real prayer is that my parents and we as a family can recover from this tragedy, place the horror behind us and resume our old lives before they were injured

Dated: May 16, 2023



Liron Greenfield

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **Declaration of Liron Greenfield** was electronically filed this the 22nd day of May 2023 with the Clerk of Court using the CM/ECF system. Parties may access this filing through the Court's Electronic Filing System.

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